

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 19-093 (JRT/TNL)

United States Of America, )  
                              )  
                              Plaintiff, ) MOTION FOR DISCOVERY  
                              ) AND INSPECTION  
                              )  
v.                          )  
                              )  
Andrew Nathaniel David Piontek, )  
                              )  
                              Defendant. )

Defendant, Andrew Nathaniel David Piontek, through his attorney, Manny K. Atwal, respectfully moves the Court to order and requests the government to *continue* to disclose the following information; and the same make available for inspection, copying and photographing:

1. Any and all written or recorded statements made by the defendant or copies thereof within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government.

2. That portion of any written record containing the substance of any relevant oral statement made by the defendant whether before or after arrest in response to interrogation by a known government agent. For example, an audio recording from December 11, 2018 and March 9, 2019. No reports from the March 9, 2019 interrogation have been provided to counsel.

3. Substance of any relevant oral statement made by the defendant whether before or after arrest in response to any interrogation by any person, known to the defendant to be a government agent if the government intends to use that statement at trial.

4. A copy of the prior criminal record of the defendant, if any, which is in the possession, custody or control of the government, the existence of which is known or by the exercise of due diligence may become known to the attorney for the government.

5. Any books, papers, documents, photographs, tangible objects, buildings or places, or copies or portions thereof which are within the possession, custody or control of the government and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at the trial, or were obtained from or belonged to the defendant. Within the criminal compliant, there is a reference to Mr. Piontek's "extensive and consistent international travel," yet, counsel has not been provided with any such documents.

6. Any results or reports of physical or mental examinations, and of scientific tests or experiments, or copies thereof which are within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government, and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at trial. This request is further noted in counsel's expert discovery motion.

If prior to trial, the government discovers additional evidence or material previously requested or ordered which is subject to discovery or inspection as herein requested, the government is requested to notify counsel about the existence of the additional material.

Dated: May 6, 2019

Respectfully submitted,

s/Manny K. Atwal

MANNY K. ATWAL

Attorney ID No. 282029

Attorney for Defendant

Office of the Federal Defender

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